

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

CARLOS ABREU
Plaintiff(s)

vs.
KIMBERLY LIPKA et al
Defendant(s)

INMATE
CIVIL RIGHTS
COMPLAINT PURSUANT
PURSUANT TO
42 U.S.C. § 1983

Case No. 9:16 CV 776

Plaintiff(s) demand(s) a trial by: ☒ JURY ☐ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff: CARLOS ABREU # 99A3027
Address: GREAT MEADOW CORRECTIONAL
FACILITY BOX 51
COMSTOCK, NEW YORK 12821-0051

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: KIMBERLY LIPKA
Official Position: MEDICAL NURSE
Address: GREAT MEADOW CORRECTIONAL
FACILITY BOX 51
COMSTOCK N.Y. 12821-0051

b. Defendant:

DR. POOLANA

Official Position:

PHYSICIAN/DOCTOR

Address:

GREAT MEADOW CORRECTIONAL
FACILITY P.O. BOX 51
COMSTOCK N.Y. 12821-0051

c. Defendant:

PHYSICIAN/DR. D. KARANDY

Official Position:

PHYSICIAN/DOCTOR, FACILITY HEALTH SERVICES DIRECTOR

Address:

GREAT MEADOW CORRECTIONAL
FACILITY P.O. BOX 51
COMSTOCK N.Y. 12821-0051

Additional Defendants may be added on a separate sheet of paper.

4. PLACE OF PRESENT CONFINEMENT

a. Is there a prisoner grievance procedure at this facility?

☒ Yes ☐ No

b. If your answer to 4a is YES, did you present the facts relating to your complaint in this grievance program?

☒ Yes ☐ No

If your answer to 4b is YES,

(i) What steps did you take? I HAVE FILED GRIEVANCES LETTERS OF COMPLAINTS AND APPEALS TO IGR, SUPERINTENDENT, COMMISSIONER, CNTPC DIRECTOR, OMIT COMMISSIONER, UNIT CHIEF, DIRECTOR OF GRIEVANCE PROGRAM, IGP SUPERVISORS AND SGT. IGR(ii) What was the final result of your grievance? REGULARLY THEY HAVE DENIED ALL MY GRIEVANCES, RETURNED MY COMPLAINTS NO PROCESSED MANY OF MY GRIEVANCES OR APPEALS REFUSED TO PROVIDE ME ANSWERS, OR RESPONSES TO MY GRIEVANCES COMPLAINTS AND LETTER OF COMPLAINTS ACTED OF A FORM DELIBERATE OR INDIFFERENT REFUSED TO TAKE CORRECTIVE ACTIONS TO ALL AND EACH OF MY COMPLAINTS LETTERS & GRIEVANCES RELATED TO THIS MATTER AND OTHER MANY OTHER ISSUES. I KEEP COPIES OF MANY OF MY GRIEVANCES & LETTER OF COMPLAINTS & MY APPEALS & OTHERS I HAVE SENTING IT TO DOCS COMMISSIONERS OFFICE, SGT OFFICE, & DENVER OFFICE

D.) DEFENDANT: DR **C. KOENIGSMANN**
OFFICIAL POSITION: CHIEF MEDICAL OFFICER
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK N.Y. 12821-0051
OR N.Y.S. DOCS Building # 2
1270 Washington Ave ALBANY, N.Y. 12226.

E.) DEFENDANT RN. MARCIA ROGUE
OFFICIAL POSITION: MEDICAL NURSE
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK, N.Y. 12821-0051

F.) DEFENDANT RN: MELISSA VAN ORDER
OFFICIAL POSITION: MEDICAL NURSE
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK, N.Y. 12821-0051

G.) DEFENDANT RN. STERYL HAVENS
OFFICIAL POSITION: MEDICAL NURSE
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK, N.Y. 12821-0051

H.) DEFENDANT RN. REBBECA BRUNELLE
OFFICIAL POSITION MEDICAL NURSE
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK, N.Y. 12821-0051

J.) DEFENDANT RN. LAURIE LA FRESCH
OFFICIAL POSITION MEDICAL NURSE
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK, N.Y. 12821-0051

K.) DEFENDANT RN. CATHERINE BOICE
OFFICIAL POSITION MEDICAL NURSE
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK, N.Y. 12821-0051

L.) DEFENDANT RN. CHRISTINE WATKINS

Official Position: MEDICAL NURSE
Address: GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK N.Y. 12821-0051

M) DEFENDANT RNI. MARY HARRIS
GREAT MEADOW CORR FACILITY
POSITION: NURSE ADMINISTRATOR
Address: HEALTH SERVICES/MEDICAL DEPT
AT GREAT MEADOW CORR FACILITY
P.O. BOX 51 CONSTOCK N.Y. 12821

N) DEFENDANT. Supt. C. Miller
Position: FACILITY SUPERINTENDENT
Address: GREAT MEADOW CORR FAC.
P.O. BOX 51 CONSTOCK N.Y. 12821-0051

O) DEFENDANT MR. ANTHONY ANNUNCI
Position: N.Y.S. DOCS COMMISSIONER
Address: GREAT MEADOW CF. BOX
51. CONSTOCK N.Y. 12821-0051 OR
N.Y.S. DOCS BUILDING 2 1220
WASHINGTON AVE ALBANY N.Y. 12226.

P) DEFENDANT MR. J. Ives.
Position: PSYCHOLOGIST
Address: GREAT MEADOW CF/MHU SATELLITE
UNIT BUILDING AT GMCF BOX 51 CONSTOCK
NEW YORK, 12821-0051

2) DEFENDANT MS. PAL
Position: PSYCHIATRIST
Address: GREAT MEADOW CF/MHU SATELLITE
UNIT BUILDING AT GMCF BOX 51 CONSTOCK
NEW YORK 12821-0051

R) DEFENDANT MR. JACKSON
Position/Address: UNIT CHIEF/MHU/OMH SATELLITE
UNIT AT GREAT MEADOW CF BOX 51 CONSTOCK
N.Y. 12821-0051 #141

S) DEFENDANT MS. COLLINS
 POSITION: ADSP/MENTAL HEALTH SERVICES OF DOCS
 ADDRESS: GREAT MEADOW CF P.O.
 BOX 51 COMSTOCK N.Y. 12821-0051

T) DEFENDANT MR M. F. THOMAS
 POSITION: FIRST DEPUTY SUPERINTENDENT
 ADDRESS: GREAT MEADOW CF P.O.
 BOX 51 COMSTOCK N.Y. 12821-0051

U) DEFENDANT MR EASTMAN
 POSITION: ~~D~~PUTY SUPERINTENDENT FOR
 SECURITY AT GREAT MEADOW CF
 ADDRESS BOX 51 COMSTOCK N.Y.
 12821-0051

W) DEFENDANT MS. PEACOCK
 POSITION DEPUTY SUPERINTENDENT
 FOR ADMINISTRATOR
 ADDRESS: GREAT MEADOW CF BOX 51
 COMSTOCK, NEW YORK 12821-0051

X) DEFENDANT ~~DR~~ ARLISS
 POSITION: DOCTOR/ORTHOPEDIST
 ADDRESS: SULLIVAN CORRECTIONAL
 FACILITY P.O.

Z) DEFENDANT B. HILTON
 POSITION: ASSISTANT COMMISSIONER/MENTAL
 HEALTH SERVICES FOR THE NYSDOCS
 ADDRESS: N.Y.S. DOCS BUILDING 2
 1220 WASHINGTON, N.Y. 12226

Z(1) DEFENDANT K. BELLAMY
 POSITION DIRECTOR OF THE INMATE
 GRIEVANCE PROGRAM STATE WIDE
 ADDRESS: N.Y.S. DOCS BUILDING 2
 1220 WASHINGTON, N.Y. 12226

#22

DEFENDANT C. BASCUE

OFFICIAL POSITION: SGT/SUPERVISOR OF THE SITE
AT GREAT MEADOW CR

ADDRESS: GREAT MEADOW CR P.O. BOX
(P.B.) 51 CONSTOCK, N.Y. 12821-0051

#23

DEFENDANT H. MCCARTHY

OFFICIAL POSITION: SOCIAL WORKER OF OMH

ADDRESS: GREAT MEADOW CR P.O. BOX
51 CONSTOCK, N.Y. 12821-0051

SATELLITE UNIT WITH BUILDING

#24

DEFENDANT MR. LYONS

OFFICIAL POSITION: SGT/SUPERVISOR OF THE
MTHU OBS. CELLS / RTRC

ADDRESS: GREAT MEADOW CR P.O. BOX
51, CONSTOCK, N.Y. 12821-0051

#25

DEFENDANT MR. P. MILEGIO

OFFICIAL POSITION: DEPUTY SUPERIN-
TENDENT FOR PROGRAM SERVICES

ADDRESS: GREAT MEADOW CR P.O.
BOX 51 CONSTOCK, N.Y. 12821-0051

#26

DEFENDANT R. LECLAIRE

OFFICIAL POSITION: PSYCHIATRIC NURSE
OF OMH / MTHU UNIT

ADDRESS: GREAT MEADOW CR P.O.
BOX 51 CONSTOCK, N.Y. 12821-0051

#27

DEFENDANT P. PINK

OFFICIAL POSITION: PSYCHIATRIC NURSE
OF OMH / MTHU UNIT

ADDRESS: GREAT MEADOW CR P.O.
BOX 51 CONSTOCK, N.Y. 12821-0051

DEFENDANT J. WINNEY

OFFICIAL POSITION: SITE COUNSELOR

ADDRESS: GREAT MEADOW CR BOX 51 CONSTOCK, N.Y.
12821-0051

If your answer to 4b is NO - why did you choose to not present the facts relating to your complaint in the prison's grievance program? _____

N/A

N/A

- c. If there is no grievance procedure in your institution, did you complain to prison authorities about the facts alleged in your complaint?

☒ Yes

☐ No

If your answer to 4c is YES,

- (i) What steps did you take? I WROTE TO IGP SUPERVISORS TO DIRECTOR OF IGP, TO THE FACILITY SUPERINTENDANT TO THE DEPUTIES OF SECURITY ADMINISTRATION PROGRAM TO THE FIRST DEPUTY SGT, TO THE DOCS COMMISSIONER TO OMH COMMISSIONER TO CNIC EXEC DIRECTOR, & UNIT CHIEF MANY TIME LETTER OF COMPLAINTS.
- (ii) What was the final result regarding your complaint? DELIBERATE INDIFFERENCE TO ALL AND EACH OF MY COMPLAINTS OR THEY REFUSED TO TAKE ANY CORRECTIVE ACTIONS IN THE MATTER.

If your answer to 4c is NO - why did you choose to not complain about the facts relating to your complaint in such prison? _____

N/A

5. PREVIOUS LAWSUITS

- a. Have you ever filed any other lawsuits in any state and federal court relating to your imprisonment?

☒ Yes

☐ No

- b. If your answer to 5a is YES you must describe any and all lawsuits, currently pending or closed, in the space provided below.

For EACH lawsuit, provide the following information:

- i. Parties to previous lawsuit:

Plaintiff(s):

N/A

Defendant(s):

N/A

< note: MY legal documents / papers RECORDS legal BOOKS ALL WERE CONFISCATED FOR THE DEARBORN MILERS EDITION AND THOMAS ON OCTOBER 15/2015 STILL THE PRESENT JUNE/2016 THE HOS REFUSED TO PROVIDE ME MY legal MATERIALS SO I DONT HAVE AVAILABLE THE RECORDS OF MY PRIORS PENDING OR CLOSED LAWSUITS

ii. Court (if federal court, name District; if state court, name County):

N/A

iii. Docket number: N/A

iv. Name of Judge to whom case was assigned: N/A

v. Disposition (dismissed? on appeal? currently pending?): N/A

vi. Approximate date of filing prior lawsuit: N/A

vii. Approximate date of disposition: N/A

6.

FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

7) ON OCTOBER/15/2015 I ARRIVE TO GREAT MOUND
CORRECTIONAL FACILITY SPECIAL HOUSING UNIT (SHU).
FROM A TRANSFER FROM SULLIVAN CORB FACILITY (SHU)
(BOX TO BOX) TRANSFERS. IN SULLIVAN C.F. THE
DOCTORS PRESCRIBED ME PAIN MEDICATIONS LIPITOR
FOR HIGH CHOLESTEROL, CLARITIN FOR WEATHER ALLERGY,
AND TUBERCULOSIS MEDICINES FOR T.B. DISEASES.
ALSO I HAVE SERIOUS PROBLEMS IN MY RIGHT HAND.
WHERE I HAVE RECEIVED TWO (2) HAND SURGERY ONE
FOR BROKEN HAND IN MARCH/2014 AND ANOTHER FOR
CARPAL TUNNEL SYNDROME, IN JULY/2015. ALSO I
SUFFER OF CHRONIC LOWER BACK PAINS AND PAINS IN MY FOOT/ANKLE

- 8) I was also diagnosed with a Gum disease TYPE OF INFECTIONS THAT CAUSE PAINS IN MY TOOTH, AND WEAK OR LOOSE MY TOOTH. SO I WAS ADVISED FOR DENTISTS IN GREEN HAVEN CF. AND SULLIVAN CF, THAT I NEED DENTAL CLEANING IN LEAST EVERY 3 MONTHS (DOCOM POLICY REQUIRE DENTAL CLEANING EVERY 6 MONTHS FOR INMATES WITHOUT GUM DISEASES) BUT IN MY CASE THIS IS A SERIOUS DISEASE SO I NEED DENTAL CLEANING EVERY 3 MONTHS FOR TO CONTROL THE DISEASES OR ANY INFECTIONS, AND AVOID LOSS OF TEETH.
- 9) HOWEVER UPON MY ARRIVE TO GREAT MEADOW CF., SINCE ALL MY MEDICAL MEDICATIONS AND MEDICAL TREATMENTS WERE ALL DISCONTINUED INCLUDING ALL CLASSES OF PAIN MEDICATIONS. THE DEFENDANTS DR KORANDY DR POOLANO AND DR KORNIGSMANN DISCONTINUED MY PAIN MEDICATIONS - LIPITOR CLONIDIN MY T.B. MEDS AND MY NEURONTIN WITHOUT ANY NOTICE WITHOUT ANY ADVISE, AND WITHOUT ANY EXPLANATIONS.
- 10) THEY HAVE ALSO FURTHER KNOWLEDGE THAT I HAD A HAND SURGERY IN JULY / 2015. AND THAT THE HAND SPECIALIST / DR ARJIS HAS TOLD AND ADVISED TO THEM THAT MY RIGHT HAND WILL TO HEAL WITHIN OF ONE YEAR. AND/OR THIS NOT WILL HEAL IN ALL, BUT THE MINIMUM TIME FOR TO KNOW IF MY HAND SURGERY HAS WORKED IN MY CARPAL TUNNEL SYNDROME WAS IN LEAST ONE YEAR SO, I WAS IN NEED OF PHYSICAL THERAPY WEAR A HAND BRACE AND RECEIVE, AND GET PAIN MEDICATIONS. THE DEFENDANTS POOLANO KORANDY AND KORNIGSMANN IGNORED DR. ARJIS PRESCRIPTIONS, OR / AND RECOMMENDATIONS.

- 11) THE DR ARLISS WAS WHO CONDUCTED THE HAND SURGERY, WHILE I WAS IN SULLIVAN C.F. AND HE WAS ALSO WHO ON 3/23/2016 PRESCRIBED OR/AND RECOMMENDED AGAIN THAT I RECEIVE PAIN MEDICATIONS, PHYSICAL THERAPY AND A HAND BRACE BUT THE DEFENDANTS AGAIN IGNORED DR ARLISS RECOMMENDATIONS OR/AND PRESCRIPTIONS, OF A FORM INTENTIONAL AND DELIBERATE & INDIFFERENT TO MY SERIOUS MEDICAL CONDITIONS & PROBLEMS.
- 12) ON OCTOBER/28/2015 THE SGT BASQUE SGT LYONS AND FIVE OTHER GUARDS / CO'S ASSAULTED ME PHYSICAL AND SEXUALLY WHILE I WAS IN THE MITH OBSERVATION CELL. I WAS DENIED OF ALL CLASSES OF MEDICAL CARE ATTENTIONS AND TREATMENTS FROM OCT/28/2015 TO THE PRESENT JUNE/23/2016 THE DEFENDANTS DR POOLANO DR KARANDY DR KOENIGSMANN, HAS DENIED ALL CLASSES OF PRESCRIBED PAIN MEDICATIONS, MEDICAL CARE MEDICAL ATTENTIONS AND MEDICAL TREATMENT TO MY SERIOUS INJURIES PAINS AND MEDICAL NEEDS. ALONG WITH ALL THE MEDICAL NURSES, DEFENDANTS.
- 13) I ORRIVED TO GREAT MEADOW CF ON OCTOBER/15/2015 MY HAND SURGERY WAS IN JULY/2015. WHEN I ORRIVED TO GREAT MEADOW CF THE PERIOD OF MY HAND SURGERY WAS ONLY OF 2 TO 3 MONTHS (FROM JULY TO OCTOBER) SO IN THE MOMENT OF THE PHYSICAL ASSAULT & SEXUAL ASSAULT. THE INJURIES IN MY HAND, WERE FRESH AND MY HAND NO HAS HEALED WELL. SO DURING THE ASSAULT MY HAND GET RE-INJURED AGAIN, AND THE PAINS WERE TERRIBLES AND THE DEFENDANTS HAS FURTHER KNOWLEDGES ABOUT ALL THIS BUT THEY IN BAD FAITH AND IN RETALIATIONS IGNORED MY PAINS AND NO PRESCRIBED NOTHING.

14) ON March /23 /2016 When I saw TO DR. ARLISS again in Sullivan C.F. He observed my hand was still pink color in the area of the surgery, so that mean my hand not has yet healed. The hand was visible swollen in the part ~~where~~ he conducted the surgery that part was hand. (this mean still swollen in process of healing) AND the pains and problems were visible, too.

15) I have saw DR. Paolono several time, in Great Meadow of Facility INFIRMARY in each time FROM NOVEMBER 2015 TO APRIL /2016 He have told me very clear that he 'DON'T CARE MY PAINS OR CHRONIC PAINS OR SEVERE PAINS. He alleged that he 'DON'T will go to prescription to me nothing in all, NO MATTER who I wrote NO MATTER how many grievances or complaints I file against him AND /OR MEDICAL STAFF AND NURSES he never will go to prescription me nothing in all. AND that he 'DON'T will go to follow DR. ARLISS recommendations or prescriptions in all. He also told me that he called to DR. ARLISS AND advised to DR. ARLISS that 'DON'T prescription nothing me because he 'DON'T will go to follow his' recommendations.

16) DR. Paolono in each interview has told me many things he has TOLD me that he hate me has screaming AND telling me a lot of racial slurs, has called me a PERVERT every time he saw, seen or see me with the special control suit. He has refused to exam me, touch me AND denied me medical care.

17) The DR Paolone Has also ignored my chronic pains in my lower back left Ankle / FOOT neck Right ARM AND Right Hand. He Has ignore my **COMPLAINTS** OF PAINS AND Bleeding FROM MY STOOE. He also Has ignore my TUBERCULOSIS AND needs FOR T.B. MEDS. He Has ignored my Gums diseases AND POSSIBLE INFECTIONS also some time He came with DIFFERENT STORIES ONE Has He say That He CONTINUE REVIEWED MY MEDICAL RECORDS (Has PASSED already 7 MONTHS AND HE NO HAS yet REVIEWED MY MEDICAL RECORDS ? THIS IS THEN AN OPEN DELIBERATE INDIFFERENCE TO MY MEDICAL needs). OTHER DAY HE ALSO ALLEGED THAT THE DR KORONDI ~~THE~~ DR KOENIGSMAN THE SUPERINTENDENT MILLER THE FDS THOMAS AND DSA MS PLACOCK HAS ORDERED HIM DON'T give me OR PRESCRIPTION NOTHING TO ME because I HAVE lawsuits AND COMPLAINTS against THE DOCS AND THE ATTORNEY GENERAL OFFICE of ASSISTANTS AND COUNSEL'S OFFICE HAS ADVISED TO THEM DON'T PRESCRIBE ME NOTHING, UNTIL THE lawsuits PENDENTS and.

18) I FILE SICK CALL SLIP / REQUEST EVERY SINGLE DAYS REPORTED MY CHRONIC PAINS in my Right Hand lower back neck Right ARM AND LEFT FOOT / ANKLE AND PAINS in my TOOTHES AND BLEEDING AND PAINS FROM MY STOOE but THE MEDICAL NURSES / DEPENDENTS LIPKA ROGUE VON ORDER, S. HAVENS, R. BRUNELLE L. La FRESCH, C. BOICE, C. WATKINS, AND M. HORRIS Has ignored my MEDICAL COMPLAINTS. Has STARTED also DENIED ME OCT MEDICATIONS eg. SUCH AS TYLENOL **IBUPROFEN** MEDICINE, **ASPIRIN**, ANTI-ACIDS AND OTHERS MEDICINES.

#1127

19) The Defendants Has also Denied me Treatments for my Bleedings And Pains From my stool (Anus Rectal / Rectum), also intentionally, And Deliberate & Indifference

20) The Defendant Lipka she started to work in the SHU in Great Meadow Ct in January / 2016. (I don't see she in October November or December 2015 And I don't if she was in vacation's in those months neither) but in January / 2016 she started to Denial me every things THOROLS Aspirines IBU-PROFEN medicines D- Anti-Acids - etc's every time I Ailed' Sick call slips And she worked in the SHU she Denied me all the CLASSES OF OTC MEDS. & MEDICAL TREATMENTS.

20) OTC MEDS, Don't need a DOCTOR PRESCRIPTIONS AND DON'T NEED A DOCTOR APPROVE - PER DOES HEALTH SERVICE POLICY MANUAL - UPON INFORMATION AND BELIEF The Policy listing a List of OTC MEDS that a medical nurses can TO Provide TO PRISONERS in General Population OR SHU DURING THE SICK-CALL SO, when a nurse Denial me OTC MEDS she or he BECOMING DIRECTLY Liabale to my Rights because if they KNOW OR LEARN OR HAVE FURTHER KNOWLEDGES THAT THE DR 'POLOMO KORANDY AND DR KORNIGSMAN ARE VIOLATED MY RIGHTS AND ACTED OF A PART DELIBERATE INDIFFERENCE TO MY MEDICAL CONDITIONS & PAINS AND NOW THE NURSE FOLLOW TO THEY AND DENIED ME OTC MEDS, THEN THE NURSES BECOME PERSONALLY Liabale OF THE VIOLATIONS OF MY U.S. CONSTITUTIONAL RIGHTS FOR HIS OR HER OWN MISCONDUCTS AGAINST ME

- 21) NURSE/DEFENDANT LIPKA SHE CONTINUE her MISCONDUCTS ALL THE MONTH OF JAN / 2016 TO EARLY OF FEBRUARY / 2016 AGAINST ME DENIED ME OTC MEDS AND MEDICAL CARE AND REGULARLY DENIED ME SICK-CALL SERVICES INTENTIONALLY AND IN BAD FAITH. I THEN STARTED TO FILE MULTIPLE GRIEVANCES AND LETTERS OF COMPLAINTS AGAINST DEFENDANT LIPKA REPORTING ALL AND EACH OF HER MISCONDUCTS AGAINST ME
- 22) THE NURSE LIPKA THEN STARTED TO RETALIATED AGAINST ME WROTE ME FALSE MULTIPLE MISBEHAVIOR REPORTS IN CONSPIRANCY WITH THE SHU STAFF / GUARDS AND SUPERVISORS SHE WROTE ME A TICKETS ON 2/18 / 2016 2/21/2016 4/03/2016 OF LOW CONDUCTS, HARASSMENTS, UNHYGIENIC ACTS INTERFERE - RENCE ACTS AND WHEN I COMPLAINING ABOUT ALL THIS FALSE REPORTS WRITTEN IN RETALIATIONS FOR MY EARLY GRIEVANCES & COMPLAINTS AGAINST HER. SHE THEN STARTED TO ASK AND TELL TO THE SHU C.O.s. THEY WROTE THE TICKETS AND SHE SIGN IT SUCH AS WITNESSES, SO SHU C.O.s STARTED ALSO **WRITE** ME FALSE TICKETS ALONG WITH RN LIPKA SHE WAS THE ONLY AND UNIQUE MEDICAL NURSES WROTE ME TICKETS DENIED ME ALL CLASSES OF OTC MEDS & DENIED REGULARLY SICK CALL SERVICES OPENLY AND INTENTIONALLY, & MALICIOUSLY
- 23) I CONTINUE REPORTING DEFENDANT LIPKA MISCONDUCTS TO RN-2/NURSE ADMINISTRATOR MS HARRIS, FHSD DR KARADY CHIEF MEDICAL OFFICER DR. KOENIGSMANN, SUPERINTENDENT MILLER DSS EASTMAN. DSA PERCOK FDS THOMAS DOUG COMMISSIONER ANNUCCI, HIS ASSISTANT & TO INMATE GRIEVANCE PROGRAM BUT SHE CONTINUED WITH HER ABUSES.

24) The Defendant Lipka, she started to GAVE ME ONLY ONE ~~TIENOL~~ **PACKETS**, OR ONE **IBUPROFEN** PACKET. (The which has only two (2) tablets each packets). AND she DIRECTED TO THE OTHER NURSES 'DON'T GIVE ME OR PROVIDE ME MORE OF ONE PACKET OF **IBUPROFEN** OR **TIENOL** before the other nurses / Defendants **THEY** gave me 2 3 4 5 OR 6 PACKETS OF ~~TIENOL~~ **IBUPROFEN** OR MEDICINE D. ANTI-ACIDS, ECT. (OTC MEDICATIONS) between OCTOBER/2015 TO EARLY OR began OF Jan/2016. but when RN. Lipka was assigned to the SHU all this changed.

25) RN Lipka excuses were that she was DIRECTED OR ORDERED (FOR UNKNOWN PERSON) DON'T GIVE ME OR PROVIDE ME NOTHING TO ME. AND added, that all was OR IS DIFFERENT NOW that in the year 2009-2010 when I was in facility in this SHU. When she will to provide me AND OTHER INMATES MORE ITEMS AND CARES in the SHU but that now the facility ADMINISTRATION AND DOES ALBANY AUTHORITY HAS ORDERED TO she DON'T GIVE NOTHING TO SHU INMATES.

26) I KNOW RN Lipka was LIED because the OTHER NURSES DON'T WAS / WERE DOING THOSE THINGS. TO ME OR OTHER INMATES in the SHU. but all changed FROM Feb/2016 TO THE PRESENT June/2016 AFTER I STARTED TO WRITING GRIEVANCES AND COMPLAINTS AGAINST RN Lipka REPORTED ALL THIS MISCONDUCTS THE OTHER NURSES / DEFENDANTS STARTED TO DO THE SAME THINGS Lipka was DOING TO ME. but NOT OTHER SHU INMATES

27 > The Defendant Lipka she continued with her retaliations against me, so for March 2016 to April 2016 she ORDERED OR Required to the other nurse DON'T give OR provide me NO OTC MEDS. in all AND LIMITED sick-call services. she did all this for that to appear that she was giving me medical care to my medical needs. example RN Lipka she work in the SHU 4 to 5 days in the week so when other nurse such as the Defendants Van Order, Harvins, Brunelle, La Fresch, Boice, Watkins, & Rogue were conducted sick-call services DON'T DON'T give me nothing in all for my chronic pains, bleeding AND symptoms caused for the restricted diets/loose. AND regularly were refused to monitor me, refused to take my blood pressure, AND weight during the imposition of the loose. They left to RN Lipka to do all this. so my complaints or claims against RN Lipka to appear without merit AND so to cover up her misconducts & retaliations against me so all was planned between the Defendants/nurse & (an) OPEN CONSPIRACY against me. & my complaints.

28 > The Facility Administration, Has IMPOSED restricted diets/loose against me of a form illegal, UNLAWFUL, since December/2015 to the present June 2016. Six/6 months straight under the loose sentences I have loose a lot of weight I HAVE REPORTED symptoms of severe stomach heartburn, nausea, vomits, constipation, bleeding AND pains from stool.

29) I REPORT ALL THIS SYMPTOMS TO THE DEFENDANTS LIPKA, BOICE, LA FRESCH, HARVINS, VAN ORDER, ROGUE, WATKINS, BRUNETTE, DALEY DURING THE SICK CALL OR IN MY SICK CALL SLIPS/REQUESTS AND REPORTED THE SAME TO THE DEFENDANTS MILLER, THOMAS, IVERS, PAL, KORNIGSTOWN, HERRIS, ANNUCCI, JACKSON, COLLINS, PEACOCK, HILTON, AND DR POOLSON, KORONDI, AND BELLAMY IN WRITTEN, TWO LETTERS, IN GRIEVANCES, IN COMPLAINTS & WHEN THEY WERE MAKING ROUNDS IN THE SHU. THEY IGNORED ALSO MY CLAIMS OR COMPLAINTS THAT THE LOAFS / DIETS WERE INADEQUATE AND NO NUTRITIVES. THE LOAFS REGULARLY WERE COMING VERY SMALL HARD NOT FRESH, OLD AND IMPOSSIBLE OF EAT AND WHEN I EAT IT THEN IT PUT ME VERY SICK, BUT THEY NEVER STOPPED IT.

30) IN THE BEGAN THE NURSES WERE GIVING ME ANTIACIDS, ONE OR TWO TYLENOL / IBUPROFEN 50' OILMENTS, FOR HEMORRHOIDS ETC. AND TOOK MY BLOOD PRESSURE OR/AND WEIGHT. HOWEVER RN LIPKA SHE WAS LIED IN THE REPORTS AND IN MY RECORDS, ALLEGED THAT I WAS WEIGHTED 210 WHEN THE WEIGHT WAS REALLY 200. & SHE WAS ALSO LIED IN MY BLOOD PRESSURES. SO I WROTE COMPLAINTS AND GRIEVANCES ABOUT ALL THIS AND AGAINST HER. SO IN THE BEGAN OF THE MONTHS OF MAY / 2016 SHE CAME FRONT MY CELL ALONG WITH THE SHU C.O.s DICKINSON, WESTON AND SHORT AND SHE STARTED TO THREAT ME CALLED ME BITCH USING RACIAL SLURS TALKING ME 'FUCKING LATINO' GET OUT OF MY COUNTRY, I GO BACK TO YOUR COUNTRY, AND OTHERS MANY OFFENSIVE WORDS.

31) She was upset AND angry because she alleged that I wrote a grievance saying that she not was reported really my weight loss & blood pressure problems AND NO REPORTED in my medical reports MANY OF my COMPLAINTS about PAINS AND THE SYMPTOMS that the looks/diet was caused in me, AND the problems with my tooth's diseases due to lack of nutritions in the looks, the which caused also my Gums diseases & PAINS go WORSE, due also to inadequate food

32) The Defendant Lipka she also threat me that I never will go get back, my pain medications medical orthopedic boots my hand braces OR/AND back braces AND physical therapy she continue yelling AND screaming me such as a crazy woman that she will go now to make surer that all AND each OF the medical nurses DON'T give me nothing in all NO OTC MEDS. NO SICK call services NO monitor me during the looks NO weight & NO blood pressure in all. The JHU Cos Dickinson short AND won't to make sign to she TO STOP. AND THEY LEFT.

33) In fact since that incident in May/2016 the Nurses/Defendants Havens Rogel Von ORDER Brunelle La Frésch Boire Watkins AND all other nurses including Lipka has denied me all OTC MEDS, has stopped to monitor me during the looks sentences. They DON'T come front my cell to check in me OR TALK with me DON'T allow me to receive sick call services AND ARE FILED FALSE RECORDS in my medical RECORDS.

34) Since May/2016 to the present June/2016 (the date that I signed this complaint) they has denied me all of my MEDS sick-call services AND all classes OR medical care, ATTENTIONS & TREATMENTS IN RETALIATIONS AGAINST ME AND IN CONSPIRACY of all it planned against me too. I HAVE WRITTEN grievance complaints DAILY REPORTS all this I keep COPIES OR all MY sick-call slips / request I HAVE 5th INMATES WITNESSES that all this is REALLY happened I HAVE WRITTEN many - PLS LETTERS OF COMPLAINTS REPORTED all this TO NURSE ADMINISTRATOR HARRIS, FHSO DR KORANDY DR POOLONG DR KORNIGSMANN SUPERINTENDENT MILLER, FIRST DEPUTY SUPERINTENDENT FOR ADMINISTRATION MR THOMAS DSA MS. PEACOCK ADSP MS COLLINS UNIT CHIEF MR JACKSON; DOCCU COMMISSIONER ANNUNCI AND REPORTED also all this TO THEM IN THEIR ROUNDS, INCLUDING TO MR IVER & MS PAL

35) MR PAL AND MR IVER HAS TOLD ME THAT THEY HAS ADDRESSED all this issues many TIME, TO THE FACILITY ADMINISTRATION AND DOCTORS & NURSE ADMINISTRATOR many TIME DURING THE MEETINGS THAT THEY CONDUCTS EVERY 15 OR 30 DAYS. BUT THAT THE SUPT MILLER DSA PEACOCK FHSO MR THOMAS AND HARRIS & FHSO DR KORANDY HAS ALLEGED THAT THEY DON'T CARE WHAT HAPPEN TO ME. AND THEY DECLINE TO ASSIST OR HELP ME OR TAKE CORRECTIVE ACTIONS IN THIS ISSUE / MATTER, AND ALLOW TO NURSES TO DO WHATEVER THEY WANT IN THE STATE.

36) DSA MS PEACOCK & FHSO THOMAS WROTE ME A MEMO ALLEGED THAT THE NURSES DENIED HAVE DENIED ME sick-call services, THAT THEY ~~SAW~~ ALOT OF TIME IN MAY-JUNE/16.

37) THE MEMORANDUMS OF THE DEFENDANT MR TITONS GAVE ME AN IDEA OF WHAT THE NURSES ARE DOING. THEY ARE FAISELY REPORTED THAT THEY ARE PROVIDED ME SICK CALL SERVICES IN MY MEDICAL RECORDS AND SEEING ME IN ROUNDS WHEN NONE OF THIS IS TRUE IN ALL. THE SHU VIDEO TAPES RECORDING THE SHU INMATES AND SHU GUARDS/COS ARE WITNESSES THAT THE NURSES ARE NOT ARRIVED FRONT MY CELL DURING THE SICK CALL ROUNDS, ARE NOT PROVIDED ME ANY OTC MEDS, ANY MEDICAL CARE, TREATMENTS OR ATTENTIONS TO MY MEDICAL COMPLAINTS PAINS, SYMPTOMS, OR BLEEDING AND TO MY MEDICAL NEEDS.

38) IN APRIL /2016 MY LIPIDOL MEDS & CLORITIN MEDS WERE RE. PRESCRIBED ME ONLY IN NIGHT TIME. THE NURSE CAME VERY NIGHT TO DELIVERY IT TO ME, BUT SHE CANNOT TO CONDUCT SICK CALL SERVICES IN THAT TIME NOR CAN SHE PROVIDE ME ANY OTC MEDS IN THAT TIME. HIS OR HER ONLY JOB OR DUTY IN THAT TIME IS PICK UP THE SICK CALL SLIPS IN THE GALLERY FOR THE SICK CALL SLIP, NEXT DAY EARLY IN THE MORNING IN THE SHU AND DELIVERY MEDICATIONS IN THE UNIT THAT IT. IF ANY INMATES MAKE ANY COMPLAINTS, SHE OR HE ALWAYS SAYS, GUYS PUT SICK CALL OR SIGN FOR SICK CALL. 'I ONLY AM DELIVERED MEDS & PICK UP THE SICK CALL THAT IT. IF THEY CONSIDER EMERGENCY SICK CALL ONLY WHEN AN INMATE HAS "CHEST PAINS" AFTER THAT INMATES IN SHU ARE DIRECTED & REQUIRED TO FILE SICK CALL ALSO REGULARLY & FREQUENTLY THE SHU COS/GUARDS DON'T ALLOW TO NURSES TO STOP WHEN INMATES CALL TO THEM. THEY SAY. SIGN FOR SICK CALL, SHE OR HE ARE ONLY DELIVERED THE MEDS. THAT IT.

39) I assume that when MR THOMAS, Alleged ~~Also~~ that I Had Contact with Nurses a lot of time I believe He is talking about the contacts that ~~me~~ had with the nurses during the delivery of my meds in night time not during the sick call services. If I every single night gave to the nurses my sick call slips Reported chronic pains in my right hand(s) & arms, lower back, left ankle/feet, pains in tooth & stool & the symptoms of the loors. (VOMITS, Nauseas, Heartburn, Stomach pains & Bleeding) AND asked for BLOOD pressure & take also my weight. AND the nurses read every night my sick-call slips, along with the SHU C.O.S. who also pick up sick call & read it to make sure it is sick-call & it is not nothing inappropriate written for inmates so it is very clear that I'M ~~not~~ received an open & deliberate rate indifference to my symptoms, medical problems AND pains, no only for the nurses who conduct sick call next day in the morning such as Lipko, but also for all nurses who pick up & read my sick call along with the SHU C.O.S. so FDS THOMAS AND D'Kembars allegations 'DON'T HAVE ANY MERITS.

40) I am in the last cell of the SHU. The nurses DON'T make rounds in the unit in the SHU. Nurses only stop in the cells of the inmates who take prescribed meds, OR / AND when they sign for sick call request. Nurses DON'T make rounds AND say to every one, 'hey I do you doing you every things is OK' 'do you have any medical issues today?' if they DON'T say, 'Guys nurse make rounds or hey I'm here. NO they only go to cell of inmate who take meds.

41) NO MATTER HOW MANY TIME A NURSE WALK IN A SHU THAT DON'T MEAN NOTHING IN ALL. THEY NEVER STOP IN ALL IN A FRONT OF AN INMATE CELL UNLESS HE TAKE MEDS, SIGN FOR SIDE CALL IS PLACED IN A RESTRICTED DIETS OR 'HAVE A CHEST PAIN IN EMERGENCY SICK CALL OR THE INMATE RECEIVED USE OF FORCE WITH STAFF, OR HAD A FIGHT WITH OTHER INMATE. AFTER THAT THEY DON'T STOP FOR NOTHING IF SHU COS DON'T ALLOW TO THEN TO STOP NEITHER.

42) I AM BEHIND A PLEXIGLASS/CELL SHIELD SINCE THE MONTHS OF OCTOBER/2015 TO THE PRESENT JUNE/2016 WITH LACK OF AIR VENTILATIONS DEPRIVED OF HOT WATERS DEPRIVED OF CLEAN UP MY CELL DEPRIVED OF CLEAN MY TOILET, SINK FLOOR, VENTILATOR (IF ANY) THE TEMPERATURE INSIDE OF MY CELL IS EXTREME & HOT PROVOKE STRONG HEADACHES, LACK OF SLEEP'S PROBLEMS FOR TO CONCENTRATIONS FEELING SUFFOCATED PROBLEMS FOR CAN TO BREATHE WELL A LOT OF SWEATS ASTHMA PROBLEMS, BLURRED VISION ALOT THIRST AND THIRSTY, AND MIGRAINES.

43) THE PLEXIGLASS/CELL SHIELD WAS REMOVE ONLY FOR FEW DAYS OR SEVERAL DAYS, IN FEB/2016 BUT RN LIPKA IN RETALIATIONS, ALONG WITH THE SHU COS/AND SGT BASCOE FABRICATED A FALSE TICKET WHERE SHE ALLEGED THAT SHE SAW ME MASTURBATED & JERK OFF INSIDE OF MY CELL. SO BECAUSE SHE & THEY HAS FURTHER KNOWLEDGES THAT LEWD CONDUCT ALONE IT IS NOT A REASONS FOR TO PLACE OR PUT TO AN INMATE(S) BEHIND PLEXIGLASSES SHE WROTE A CHARGE OF UNLAWFUL ACT THAT IS THE ONLY CHARGE THAT WILL TO PLACE ME BACK BEHIND PLEXIGLASSES, SO SHE WROTE ME ON 2/18/2016.

(M22)

44) This will take very easy for me to show to this court that the ticket AND charges were false in Retaliation AND in Conspiracy & Planned by RN Lipka & staff. All the situ video tapes preserved about the incidents reported & alleged by RN Lipka show clearly that I didn't ~~did~~ nothing wrong in those days in question. include in those or some of the video tapes also showed clearly that RN Lipka never had front my cell location, or cell door second. The other alleged tickets or lewd conduct RN Lipka never mentioned ANY things about UNHYGIENIC ACT but one time she learned that my cell shield / Plexiglass was removed she wrote me a ticket alleged lewd conduct but added the charge UNHYGIENIC ACT.

45) She & C.O. Stevens were unable can to say during the hearing why they ~~add~~ the charges UNHYGIENIC ACT if they never wrote which were the alleged UNHYGIENIC ACTS, & the Rules / PRISON RULES it say that UNHYGIENIC ACT is only when an inmate throw waters, urines, feces, foods to staff or inmates or spit on staff or other inmate. The directive 4933 situ. & state regulation under title 7 NYCRR part 300-305 / title VI also explain the same, so where is the alleged UNHYGIENIC ACT? also other inmates has receive tickets for alleged lewd conducts / exposure / masturbations / etc. AND they never are placed behind Plexiglasses in all. also nurse Lipka & situ staff, wrote me the tickets or multiple tickets false with the only purpose or place me in restricted diets in bad faith & intentionally because they have further knowledge that it put me very sick, cause pains, & bleeding.

46) I Have Appeared all and each of the tickets, Cell shields orders and looks sentences to Defendants Mitter Eastman & Doccs Commissioner Annucci but they has affirmed all it and denied me all the Discretionary Review even I explained to they clearly the symptoms pains violations of my due process rights the conspiracy of AND STARK MISCONDUCTS of false tickets against me, I even the tapes / video tapes showed my innocence they ANY way has ignored my claims AND complaints of a form deliberate & INDIFFERENT to the present of this complaints

47) The Defendants above clearly has showed me that they are part also of this conspiracy of Retaliations of DISCRIMINATIONS against me in Great Meadow CR SHU

48) The Defendants Ives Pat AND Jackson Has a similar MISCONDUCTS AND ARE PARTS OF THE CONSPIRACY Retaliations of DISCRIMINATIONS against me, because when I arrive TO Great Meadow CR SHU from Sullivan CR I was a Mental Health Level ONE Designated 59 for the Office of Mental Health (OMH). That mean also that on inmate designed level ONE OR/AND level ONE, cannot be placed under RESTRICTED DIETS looks. AND the tickets that I was received don't qualify for I be placed in RESTRICTED DIETS, so, I make alot of grievance AND complaints I report all this to MR Ives & MR Pal who are Assigned to the SHU AND to the unit chief MR Jackson they told me you are 100% Percent Rights you are NOT supposed to be placed in looks by law/regulation of DOCs Directives.

49) There is also a lawsuit/settlement called DAI v OMH / DOCS, the which was settled in the Southern District Court. They say the same things I have designed level 1 or/and level 1(5) or level 2. Don't qualify for to be placed in looks or cannot be placed in or under restricted diet sentences. MR Ives told me look that people here in Great Meadow if they always doing whatever they want, they don't care what the courts judges laws regulations or directives say, they are doing all this for many years.

50) However MR Ives for to con to cover up the defendants Miller DSS Eastman Annucci AND DOCS MISCONDUCTS AGAINST ME. He the DA PAC & UNIT Chief MR Jackson changed my level 1 to level 3 between December/2015 to Feb/2016. Then the Superintendent Miller DSS Eastman FDS THOMAS AND Commissioner Annucci ORDERED TO all hearing officers to sentence me to Restricted Diet & Looks for each tickets that I get or write against me for any charges be true or be false.

51) AFTER THE N.Y.S DOCS SETTLED A LAWSUIT WITH THE NEW YORK CIVIL LIBERTIES UNION (NYCLU) STOPPED THE LOOKS RESTRICTED DIETS IN THE CASE PEOPLE v. FISCHER ETAL DOCKET # 11-CV-2694 SDNY WHERE THE DOCS AGREED TO STOP THE LOOKS SENTENCES OR THE IMPOSITION OF THE LOOKS STATE WIDE AFTER THE JUDGE SIGN & APPROVE THE SETTLEMENT IN APRIL/2016, THE WHICH THE JUDGE DID.

52) However TO THE PRESENT OR THIS COMPLAINT DOCS AND THE DEFENDANTS CONTINUE INTENTIONALLY AND IN BAD FAITH SENTENCED ME TO RESTRICTED DIET, LOCKS FOR HORM ME AND INJURY ME OR KILL ME. SENTENCED ME TO LOCKS SINCE DECEMBER 2015 TO THE PRESENT JUNE 2016 (GOING FOR JULY 2016) THE WHICH ARE 6 (SIX) MONTHS STRAIGHT UNDER LOCKS & IT HAS CAUSED HORM & INJURIES IN ME, SUCH AS LOSS WEIGHT, VOMITS, NAUSEAS, HEART BURN, SEVERE STOMACH PAINS, BLEEDINGS & CONSTIPATIONS ALSO IT LOCKS ARE NOT ADEQUATED & IT IS NO NUTRITIVE, INCLUDE ALL THE HEARING OFFICERS L.T.S 'CAPTAINS SGTs / SUPERVISORS COUNSELORS & SOCIAL WORKS HAS TOLD ME THAT THE LOCKS HAS STOPPED ALREADY NO OTHER INMATES IN THIS SITUATION, & GENERAL POPULATION ARE NOT RECEIVE LOCKS SENTENCES NO MORE, FOR ANY TICKETS OR CHARGES.

53) However THEY ALSO TOLD ME THAT ALL THIS SENTENCES OR LOCKS THAT I AM RECEIVE CAME FROM BY ORDERS OR SUPV. MILLER DSS EASTMAN FDI THOMS & DOCS ALBANY AUTHORITIES APPROVED BY COMMISSIONER ANNUNCI.

54) IN FACT BEFORE A PRISONER IS SENTENCED OR PLACED IN LOCKS, THE SUPERINTENDENT HAS THAT APPROVE IT & DOCS COMMISSIONER HAS ALSO THAT APPROVE IT SO MILLER, EASTMAN THOMS AND ANNUNCI HAS APPROVED IT WITH THEIR SIGNATURES, OR A FORM DELIBERATE AND INDIFFERENT, INTENTIONALLY AND IN BAD FAITH AGAINST ME IN RETALIATIONS APPROVED MULTIPLE SENTENCES OR LOCKS WITHOUT CARE ABOUT MY HEALTH, SAFETY, & CARE.

55) THE DEFENDANTS MILLER ANNUNCI, EASTON, TITONS, DR POOLANO, DR KARAN, -DI, RN 'LIPKA', BRUNELLE, VAN ORDER, ROGUE, HAVENS, LA PRESCH, BOICE, WATKINS, KORNIGSMANN, DR PAL, MR IVER AND MR JACKSON HAS FURTHER KNOWLEDGES THAT ALSO THE FOOD IS UNPALATABLE AND IT CAUSE A "WEIGHT CYCLING" OR THE REPEATED GAIN AND LOSS OF WEIGHT. THE WEIGHT CYCLING POSSES A SERIOUS THREATS TO ONE'S HEALTH BY INCREASING THE RISK OF CARDIO-VASCULAR PROBLEMS AND COULD CAUSE BLEEDING ULCERS AND INCLUDE DEATH FROM ALL CAUSES.

56) THE DEFENDANTS MILLER, EASTON, TITONS AND ANNUNCI ALSO DENIED ME TO PARTICIPATE IN THE PASS-OVER IN THE MONTH OF APRIL/2016. MY RELIGION IS JEWISH SINCE THE YEAR 2006-2007 TO THE PRESENT CLOSELY FOR 10 YEARS STRAIGHT I RECEIVE KOSHER MEAT AND I ALSO PARTICIPATE IN ALL THE JEWISH FESTIVALS INCLUDING THE PASS OVER EVERY JOCK YEAR IN THE MONTH OF APRIL. BUT THIS YEAR THE DEFENDANTS INTENTIONALLY IN BAD FAITH AND IN RETALIATIONS OF DISCRIMINATIONS DON'T ALLOWED ME TO PARTICIPATE IN THE PASS-OVER ALLEGED THAT I HAVE A SENTENCES OR WORDS, AND THAT I WILL ONLY RECEIVE THE WORDS THAT IT THAT THEY DON'T CARE MY RIGHTS OR RELIGION. OR WHAT THE DOCS DIRECTIVE # 4933 OR # 4202 SAY OR STATED.

57) THE DOCS DIRECTIVE 4933 § 304.2 (h) SAY THAT THE WORDS WILL BE SUSPENDED DURING THE PASSOVER #1271

58) Docu Directive 4933 § 304.2(b) stated clearly the following below:

" A Pre-hearing restricted diet OR a restricted diet disciplinary sanction shall be suspended during the Passover Holidays for an inmate who is designated as Jewish in accordance with Directive # 4202 " Religious Program AND Practices "

59) So the Directive 4933 is very clear. The first Amend. Right is also very clear AND the Federal laws under the Religious Freedom Restoration Act (RFRA) AND the Religious Land Use and Institutionalized Persons Act (RLUIPA), also are very clear AND the decisions AND case laws in this district & other district courts are also very clear regarding this issues, AND MATTERS about Religion, Diets, AND Holidays

60) The Defendants also refused to allow me to receive my Matzos AND Groger Juices during the Sabbath days. Alleged the same OR similar things that because I'm in sentences OR locks I cannot get nothing in all, no waters no Juices no foods ect. ONLY the locks. The Defendants were doing all this intentionally in bad faith & with an open deliberate indifference to all my rights & believe even CORC in Albany agreed with me that it's entitled to receive my Matzos & Juices during the locks. The Defendants alleged fucking CORC/Docu in Albany.

61) I FILE MULTIPLY GRIEVANCES & COMPLAINTS ABOUT ALL THIS ISSUES I ALSO WROTE MULTIPLY LETTERS TO DOCS COMMISSIONER ARNOLD & OTHERS STAFF IN ALBANY I WROTE TO THE RABBI SPOKE WITH HIM WITH THE ITIMON & OTHER CHAPLAIN STAFF I WROTE TO SUPR. MILLER DSS EASTMAN DSS MELODY DSA PROCOCK FDS THOMAS SPOKE WITH THE SGTs / SUPERVISORS L.T.S AND WATCH COMMAND AND CAPTAINS IN THEIR ROUNDS IN THE SHU. BUT ALL AND EACH OF ~~THEY~~ TOLD ME THE SUPR MILLER DSS EASTMAN & FDS THOMAS SAY NO THAT YOU CANNOT GET YOUR PASS OVER MEALS NOR SABBATH JUICES AND CRACKETS NEITHER.

62) MR IVER WAS ALSO PART OF THE CONSPIRACY AND ~~PLAN~~ OF THE ASSAULTS PHYSICAL AND SEXUAL AND I HAVE SUFFERED IN THE HANDS OF STAFF (SGTs & COs) ON OCTOBER / 28 / 2015 IN THE MICH OBS. CELL. I HAVE RECEIVED LEARNED READING MY MENTAL HEALTH RECORDS THAT MR IVER WROTE THAT ON OCT / 28 / 2015, I REPORT TO HIM THAT I WILL TO ROPE (VIOLATE) AND ASSAULT TO THE GENERAL LIBRARY LIBRARIAN MS LARROW AND ASSAULT TO STAFF. AND FOR THIS REASONS HE SENT ME TO THE MICH OBS. CELL

63) HOWEVER THIS IS NOT TRUE IN ALL BECAUSE ON 10 / 28 / 2015 MR IVER CAME FROM MY CELL HE THREAT ME WITH PHYSICAL ASSAULTS ALLEGED 'THAT I HAS FILED COMPLAINTS AGAINST ME AND POST LAWSUIT AND THAT I NEED TO PAY TO HIM ALL THIS, AND HE TOLD ME WATCH THE POWERS THAT I HAVE IN THIS FACILITY.

64) When MR IVER walked away HE SPOKE WITH SGT BASCUE AND I DON'T WHAT HE TOLD TO SGT BASCUE SGT BASCUE TOLD ME THAT I NEED MANDATORY TO GO TO THE MHU OBS. CELL, BECAUSE MR IVER SAY, THAT I NEED TO GO. AND THAT I CANNOT TO REFUSE GO TO THE MHU OBS. CELLS. I EXPLAINED TO THE SGT BASCUE THAT FOR MY UNDERSTANDING, AN INMATE CAN ONLY BE PLACED IN THE MHU OBS. CELL IF THE INMATE TO REFUSE TO SAT FOR A LONG PERIOD OR TIME THREAT SELF HARM INJURIES TO KILL HE OWN SELF OR HAS THOUGHT SUICIDES, OR HAS CUT OR HARMED HIS OR HER OWN SELF OR TRIED A SUICIDES. I HAVE NOT REPORTED NONE OF THIS TO NO ONE.

65) The SGT BASCUE TOLD ME THAT I NEED TO RESOLVE MY PROBLEMS PERSONALLY WITH MR IVER. I DECLINE TO GO TO THE MHU OBS. CELLS, SO THE MHU SGT LYONS COME FRONT MY CELL AND TOLD ME THAT THEY HAS READY A CELL EXTRACTION TEAM FOR ~~TO~~ USE ANY KIND OF FORCE FOR PLACE ME IN THE MHU OBS. CELLS, SO THAT IT IS MORE BETTER IF I GO TO MHU OBS. CELLS VOLUNTARY. SO I AGREED OR ACCEPTED TO GO TO THE MHU OBS. CELL FOR AVOID SO THE USE OF FORCE COMPLETELY UNNECESSARY. I WAS ESCORTED TO THE MHU OBS. CELLS & NO OMH/ MHU NURSES HAS ANY KNOWLEDGE WHY I WAS IN THE MHU OBS. CELLS. AFTER THE INTERVIEW WITH A NURSE CALLED MS PINK, THE SGT BASCUE, SGT LYONS AND SGT C.O.S ASSAULTED ME PHYSICALLY & SEXUALLY AND DENIED ME ALL CLASS OF MEDICAL CARE & ATTENTIONS TO MY SERIOUS PAINS & INJURIES AND PLACED ME IN THE LAST CELL OF THE MHU OBS.

66) The Defendant MR Ives STOPPED FROM my cell along with a CO. AND HE TOLD ME, YOU DO YOU KNOW WHO I'M? NOW DO YOU KNOW THE POWER THAT I HAVE IN THIS FACILITY? HE WAS SMILED & JOKED WITH THE CO. & LAUGHED WHEN I REPORT TO HIM THE SEXUAL ASSAULT & THE PHYSICAL ASSAULTS & MY INJURIES. HE ALSO TOLD ME NO ONE WILL GO TO BELIEVE THAT I PLANNED ALL THIS. I HAVE A GOOD REPUTATION IN DOCCS, CNVPC, OMH IN THIS FACILITY, AND OUTSIDE. ANYWAY DOCCS AND THIS ADMINISTRATION TO HATE YOU ALOT, MR Ives ADDED. AND HE SAY THEY DON'T CARE WHAT HAPPEN TO YOU ANYWAY. AND HE LEFT LAUGHED & JOKED & SMILED. HE DENIAL ME ALL CLASSES OF MEDICAL AND MENTAL HEALTH SERVICES.

67) NEXT DAY ON 10/29/15 I REPORT THE INCIDENT TO SGT MILLER & DSS EASTMAN IN THEIR ROUNDS IN THE MICH. OBS. CELLS EARLY IN THE MORNING BUT THEY CALLED ME A CATSUCKER AND A COCKSUCKER, WHEN I EXPLAINED TO THEM THE ASSAULTS, PHYSICAL AND SEXUAL, AND MY INJURIES OVER ALL MY BODY & I SHOWED THE BLOOD TOO TO THEM. BUT THEY IGNORED ME AND CONTINUED WALKING.

68) I REPORT ALSO THE INCIDENTS AND MY INJURIES AND ASSAULTS TO NURSES MS HAYBES A NURSE CALLED MS K. TO THE DEFENDANT POL TO A SOCIAL WORKER AND TO THE DEFENDANT JACKSON. THEY ONLY RECOMMEND ME DON'T REPORT THE INCIDENTS AND THEY SENT ME IMMEDIATELY TO THE SHU ON 10/29/2015.

69) MR. IVES ALSO WROTE IN MY MENTAL HEALTH RECORDS THAT I REPORT TO HIM THAT I WILL GO TO EXPOSE MY PENIS AND MASTURBATE IN FRONT OF EVERY STAFF FEMALE OR MALE FOR I GET A MENTAL HEALTH LEVEL ONE (5) AND SO GO TO A MENTAL HEALTH PROGRAM AND SO CAN TO RELEASE OF THE SITU.

70) HOWEVER IN NO TIME I HAVE REPORT SUCH STUPID THINGS TO MR IVES THE WHICH DON'T HAVE ANY SENSE IN ALL. HE ALSO PROHIBITED ME TO TALK ABOUT THE PHYSICAL AND SEXUAL ASSAULTS WITH HIM OR / AND DR. PAL DURING MY INTERVIEW WITH THEM EVERY 15 DAYS TO 30 DAYS IN THE SITU, BUT REGULARLY THEY ALSO DENIAL ME SUCH INTERVIEWS AND AFTER TO OBLIGE OR WRITE THAT I HAVE REFUSED OR DECLINED THOSE INTERVIEWS WITH THEM.

71) I HAVE REPORTED SEVERAL TIME TO DEFENDANTS IVES AND PAL OF MR JACKSON SERIOUS DEPRESSIONS, STRESS, DISTRESS AND PROBLEMS FOR SLEEPING, TO CONCENTRATIONS, FLASHBACK, AND OTHER PROBLEMS AFTER THE PHYSICAL & SEXUAL ASSAULTS AND THE MULTIPLE MISCONDUCTS OF STAFF AND MEDICAL STAFF, AND DOCS STAFF / DEFENDANTS AGAINST ME. THE DR PAL, PRESCRIBED ME FEW PSYCHIATRIC MEDS, BUT MR IVES HE IS SO UPSET AND ANGRY THAT DR PAL PRESCRIBED ME MEDS OR TREATMENTS THAT HE IN RETALIATIONS IN CONSPIRACY & IN DIRTY PLAN AGAINST ME HAS TOLD TO DR PAL, THAT I DON'T WANT MY MEDICATIONS.

72) MR Ives Has also used to the mental health nurses (psychiatric nurses) for report false statements against me such as ~~that~~ that I have exposed my pills to them that I have refused to take my meds OR that I am TRICK/CHEAT to the nurses with my meds ACTED LIKE I'M TALKING IT, BUT I REALLY DON'T TAKE IT. HOWEVER FIRSTLY NO NURSES IN ALL WALK IN THEMSELVES IN THE SHU. THEY ALWAYS GET ESCORTED BY C.O.s AND NO C.O.s HAS ALLEGED OR WRITTEN ANY TICKETS OF UNW. CONDUCTS TO ANY MENTAL HEALTH NURSES DURING THE TIME THAT I HAVE BEEN UNDER PSYCHIATRIC MEDS. SECOND NO MENTAL HEALTH NURSES HAS TELL ME NOTHING IN ALL ABOUT ME ALLEGEDLY EXPOSED TO THEM AND NO REPORTED NOTHING TO NO C.O.s WHO ESCORT TO THEM THIRD IN NO TIME I HAVE CHEATING WITH MY MEDS. I TAKE ALWAYS IT. ALSO WHEN AN INMATE IS ACCUSED OF CHEATING WITH PSYCHIATRIC MEDS. RATHER THAN DR. PAT OR DMH AUTHORITIES TO DISCONTINUE ANY MEDS THEY CRUSH(ED) IT OR GIVE IT IN LIQUID TO THE INMATE(S).

73) FOR LAST MR Ives also alleged that I HAVE TRILLING HIM THAT I DON'T WANT MY MEDICATIONS. IN APRIL /2016 DR. PAC DISCONTINUE ALL AND EACH OF MY PSYCHIATRIC MEDS. WITHOUT ANY ADVISES ANY NOTICES, & ANY EXPLANATIONS. I WROTE ALOT OF COMPLAINTS ABOUT ALL THIS ISSUES. SO IN MAY /2016 SHE AGAIN TO RE. PRESCRIPTION MY PSYCHIATRIC MEDS AND SHE PROMISED ME DON'T LISTEN TO MR Ives OR THE NURSES & DON'T STOP OR DISCONTINUE MY MEDS. AGAIN.

74) MR PAL she alleged me that ~~before~~ she DISCONTINUED OR STOP my MEDS, she will TO FIRST TALK WITH ME AND LOOK WHICH ARE THE PROBLEMS. However, in June/2016 (THIS MONTH) she again DISCONTINUED MY MEDS WITHOUT ANY ADVICE ANY NOTICE AND WITHOUT ANY EXPLANATIONS IN ALL. SHE STOPPED OR DISCONTINUED ALL THIS ON June/15/2016.

75) AFTER ON June/23/2016 I HAVE LEARNED WHY she DISCONTINUED OR STOPPED my MEDS. THE PROBLEMS WAS AGAIN MR IVER. THE WHICH HAS SOME INFLUENCE OF CONTROL IN DR PAL. AND UNIT CHIEF MR JACKSON. ON June/15/2016 MR IVER WAS MAKE ROUNDS IN THE SHU. HE STOPPED FRONT my CELL. HE ACCUSED ME OR WROTE A LETTER TO A NURSE (PSYCHIATRIC NURSE) CALLED MS Leclair. THE WHICH HE CLAIM OR ALLEGED THAT SHE IS HER GIRL FRIEND OR HE LIKE SHE OR FEEL IN LOVE OK SHE. HE ALLEGED THAT THE LETTER THAT I SUPPOSEDLY SENT TO RN Leclair, alleged THAT SHE IS BEAUTIFUL OR THAT I FEEL IN LOVE OK SHE, OR THAT I WANT TO FUCK SHE IN THE ASS OR BUTT, BECAUSE SHE HAVE A BIG BUTT. ETC. MR IVER ALLEGED THAT I NEED TO PAY FOR ALL THAT, IN REPRISALS FOR MY LETTER TO RN Leclair.

76) MR IVER REGULARLY TOLD ME THAT I DON'T HAVE ANY RIGHTS, THAT THIS IS NOT MY COUNTRY, THAT THE U.S. CONSTITUTION, DON'T TO PROTECT ME BECAUSE I DON'T BORN IN THIS COUNTRY. THAT HE WISH ME DIE, OR STAFF KILL ME. SO ON June/15/2016 WE FALL IN ARGUMENTS, ABOUT HIS STUPIDS & WITHOUT SENSE COMMENTS.

77) in fact on June / 15 / 2016, DR Pal stopped & discontinued all my PSYCHIATRIC MEDS in REVENATIONS for the alleged letter that I sent to RN Leclaire, based in the explained to she for DEFENDANT MR IVER.

78) June / 20 / 2016 THE DMH / MHH UNIT CHIEF MR JACKSON WAS MAKING ROUNDS IN THE SHU, I STOPPED HIM FRONT MY CELL AND EXPLAINED THE PROBLEMS OF REVENATIONS TO HIM. AND MR IVER AND PAL MISCONDUCTS WITH MY MEDS. AND REPORTED HIM THE LACK OF SLEEP MY DEPRESS DISTRESS FLASH BACK, AND OTHER PROBLEMS, AND THE DELIBERATE INDIFFERENCE OF DR PAL & MR IVER. THE DEFENDANT JACKSON TOLD ME THAT MR IVER & DR PAL 'ARE WRONG, AND HE WILL TO TALK WITH THEM. MR JACKSON TOLD ME THAT DMH / MHH NURSES DONT WORK FOR DOCS THAT THEIR JOB & DUTY IS DELIVERY MY PRESCRIBED MEDS THAT LEWD CONDUCTS OR AN ALLEGED LETTER ARE NOT REASONS FOR TO DISCONTINUE MY MEDS. THAT NURSES ARE NOT SUPPOSED TO DO COS / GUARDS JOB. THAT IT IS THE COS RESPONSIBILITIES TO Decide WHO WRITE A TICKET AND LET TO THE HEARING OFFICER TO DE-TERMINED IF A PERSON / INMATE / IS GUILTY OR NOT BUT TO DISCONTINUE MEDS FOR LEWD CONDUCTS OR LETTERS IS COMPLETELY WRONG BECAUSE REPRISALS AGAINST INMATES IN PRISONS IS WRONG. THAT ONLY NURSE PINK SHE REPORTED ONE TIME THAT SHE BELIEVE I WAS CHEAT IN MY MEDS BUT THAT SHE OBSERVED ME TO TAKEN IT AFTER SHE CALLED ME THE ATTENTIONS. HOWEVER I EXPLAIN HIM THAT THE STATEMENT OF RN PINK NO HAS SENSE BECAUSE MY MEDS WAS DISCONTINUED ON June / 15 / 2016 (ARGUMENTS WITH IVER)

79) MR JACKSON ALLEGED THAT HE WILL TO TALK WITH DR PAL FOR THAT SHE COME TO THE SHU TO VISIT ME, AND PRE-OR RE. PRESCRIBE MY MEDS BACK. AND DON'T TO DISCONTINUE MY MEDS IN LEAST IF I REFUSE TO TAKE IT FOR A LONG PERIOD OF TIME LIKE FOR 3 OR ONE WEEK STRAIGHT. MR JACKSON EXPLAINED ME THAT AN INMATES CAN REFUSE TAKE MEDS FOR FEWS DAYS BUT NOT 3 TO 7 DAYS STRAIGHT. THE WHICH IT NOT WAS MY CASE

80) June/23/2016 DR PAL & MR IVERS CAME TO THE SHU TO TALK WITH ME. DURING THE INTERVIEW MR IVERS & DR PAL ADMIT ME THAT SHE DISCONTINUE MY MEDS BECAUSE MR IVERS ADVISED TO ~~SHE~~ THAT I WROTE A ALLEGED LETTER TO RN LECLOIRE SO THEY BELIEVE THAT ~~I~~ NEED TO BE PUNISHED. I EXPLAIN TO THEM THAT PUNISH IS A TYPE OF RE-PRISALS OR RETALIATIONS AND THEY ARE ACTED OF A FORM DELIBERATE & INDIFFERENT PLACED MY SAFETY AND HEALTH OR WELLBEING IN DANGER THAT DISCONTINUE MEDS WITHOUT ADVISES CAN 'CREATE A SERIOUS POSSIBLE SUICIDES MORE STRESS AND MORE DEPRESSION. I EXPLAINED TO THEM THAT I CANNOT SLEEP I FEEL MORE STRESS AND DEPRESSED. & THAT I WILL TO KILL MY SELF. THAT I REALLY NEED MY MEDS. THAT I WILL INCHUSE TAKE IT IN LIQUID OR 'CRUSH. HOWEVER THEY TOLD ME NO, WE DON'T WILL GO TO GIVE TO YOU BACK ANY CLASSES OF MEDS. WE DON'T CARE IF YOU KILL YOUR SELF CANNOT SLEEP OR FEEL STRESS OR DEPRESS. THEN, THEY STARTED TO YELL & SCREAMING ME CALLED ME A ROPER THAT THEY HAS READ MY CASES AND RECORDS THAT I'M A SEX OFFENDER LEVEL III. ETC. & MR IVERS WAS SMILED.

81) EVERY TIME DR PAL YELL OR SCREAM ME HE WAS SMILED LIKE THIS WAS FUNNY FOR HIM AND WHEN SHE DAILED ME, MY MEDS AND CALLED ME A ROGER HE GET MORE HAPPY AND LAUGHED AND SMILED, SHOWED ME CLEARLY THAT HE REALLY HATE ME ALOT I WANT OR LIKE SEE ME SUFFERED AND THAT HE HAS A CONTROL IN DR PAL AND UNIT CHIEF JACKSON.

82) I WROTE TO MR JACKSON TO CNYAC EXECUTIVE DIRECTOR OMH COMMISSIONER TO SUPERINTENDANT MILLER TO DEFENDANT COLLINS AND TO DOCS COMMISSIONER ANNUNCI AND HIS ASSISTANT MR HILTON REPORTED MR IVER AND DR PAL MISCONDUCTS AGAINST ME AND COMPLAINING ABOUT MY MEDS BUT THEY HAS FAILED OR REFUSED TO TAKE CORRECTIVE ACTIONS IN ALL THIS ISSUES OF MATTERS.

83) THE DEFENDANT MS BELLAMY SHE HAS FURTHER KNOWLEDGES THAT THE IGP SUPERVISORS THE IGP/IGRC SGT. BEEBO AND IGP CLERKS ARE NOT PROCESSED AND FILED MANY OF MY GRIEVANCES COMPLAINTS & APPEALS TO SUPERINTENDANT & CORE IN ALBANY. SHE ALSO HAVE LEARNED ALOT OF THIS MISCONDUCTS BECAUSE OTHERS INMATES HAS WRITTEN MULTIPLY SIMILAR OR SAME COMPLAINTS BUT SHE HAS REFUSED OR FAILED TO RESOLVE ALL THIS OR TAKE CORRECTIVE ACTIONS & WHEN I APPEAL TO THE NEXT LEVEL EG SUPT & CORE SHE RETURN ME ALL MY APPEALS/COPIES OF GRIEVANCES ALLEGED THAT I CAN DO SO PER DOCS DIRECTIVE #4040 THAT THEY DON'T FOLLOW THE REGULATIONS UNDER TITLE 7 NYCRR ONLY DIR #4040 & CORRECTION LAW § 139 ALSO SHE IS PERSONALLY LIABLE OF MANY OF MY CLAIMS BECAUSE SHE LEARNED OF THOSE VIOLATIONS IN MY LETTERS/GRIEVANCE

84) When The Defendant Bellomy And The Other Defendants Read My Grievances And Letter Of Complaints, And Or Appeals About The Misconducts Of Nurses, Mental Health Staff Doctors The Physical & Sexual Assaults The Denial Of My Medical & Psychiatric Meds The Chronic Pains My Symptoms The Restricted Diets The Bleeding My Gun Diseases My Tuberculosis Issues The Conditions Of My Hand The Conditions Of Confinements In my cell behind plexiglass And Denied Or Cleaning my cell toilet sink floor And The Temperature in my cell And The Denial Of my Foods Or Proper Nutritive Foods Clearly That Defendants become liars, also for such violations when she he or they failed to correct them in the course of them his or her supervisory responsibilities, & more if they has power/authority.

85) The Defendants has acted of a form deliberate and indifferent to my complaints and conditions of harsh confinement, that clearly has placed my safety core well being life security (security) welfare core & health in an imminent danger of serious harm and injuries but even has such authority or power has refused & failed to use they for to do corrective actions and stop the violations of my rights the abuses and retaliations & discriminations that I am suffering in the hands of the defendants in Great Meadow C.R. And when the defendants in Albany return back my letters/complaints it is a type also of deliberate indifference

85) MY TOILET HAS BREAK SEVERAL TIME, LOT OF URINES AND FECES HAS BE COMING FROM UNDER MY TOILET, OR FROM THE TOILET OR VENTILATIONS DUE TO THE CONNECTIONS BETWEEN THE TOILETS BEHIND MY CELL WALLS VIA THE CATWALK. THE DEFENDANTS IN GREAT MEADOW CO HAS FORCED ME TO BE DAYS WITH FECES & URINES IN MY CELL FLOOR AND THEY HAS REFUSED TO ALLOW ME CLEAN MY CELL SUCH AS DEFENDANTS MILLER THOMAS EASTMAN BARCEL MELEGO COLLINS 'PEACOCK' IVES JACKSON AND MCCARTHY WHO HAS OBSERVED THE PROBLEMS IN THEM SHU ROUNDS EVERY WEEKS IN THE SHU. & MS WINNEY EVERY SINGLE DAY.

86) MS MCCARTHY SHE REGULARLY DENY ME MENTAL HEALTH SERVICES IN HER SHU ROUNDS SHE, ALWAYS REFUSED TO TALK WITH ME OR STOP FRONT MY CELL AFTER MR IVES ORDERED TO SHE DON'T STOP FRONT MY CELL, DON'T TALK WITH ME & DON'T PROVIDE ME ANY MENTAL HEALTH SERVICES ORDER. I WROTE A LETTER TO OMH CNIPC & DOCS & UNIT CHIEF REPORTED THAT SHE IS MORE BETTER THAN MR IVES & THAT I HAVE A MORE BETTER RELATION WITH SHE ~~THAN~~ THAT WITH MR IVES, SO SHE WILL BE ASSIGNED TO SHU(A) FULL TIME BECAUSE SHE ONLY WALK IN SHU WHEN MR IVES IS NOT IN THE FACILITY. SO IN RETALIATIONS MR IVES ORDERED TO SHE 'DON'T TALK WITH ME & DON'T STOP FRONT MY CELL & DON'T PROVIDE SERVICES'. THE SAME MR IVES ORDERED TO DEFENDANTS MS WINNEY, MS COLLINS & MS PEACOCK AFTER I REPORT TO MR IVES IN AN INTERVIEW IN SHU THAT I HAVE A GOOD RELATIONS WITH MS COLLINS & MS PEACOCK & MS WINNEY. THEY IMMEDIATELY STOPPED OF TALKING WITH ME & DON'T STOP FRONT MY CELL AFTER MR IVES SPOKE WITH THEM.

88) I DON'T KNOW WHAT MR IVER TOLD TO THOSE DEFENDANTS BUT I KNOWING ANYBODY MR IVER. AND THAT HE HATE ME ALOT & DISCRIMINATE ME AND REGULARLY RETALIATE AGAINST ME. THIS IS PROBLEMS THAT HE AGAIN CAME FRONT THEY WITH ONE OF HIS FANTASTIC LIES, AND FALSER & FABRICATED STATEMENTS, SUCH AS ALWAYS HE DID THE CO. WESTON, TOLD ME THAT MR IVER TOLD TO MS. MCCARTHY, MS COLLINS, ~~WANNY~~ MS PEAKCOCK THAT I TOLD HIM THAT ~~MS~~ MCCARTHY, COLLINS AND PEAKCOCK, ~~ALSO~~ MS WINNEY ALLOW ME TO JERK OFF AND MASTURBATE FRONT THEY. MOREOVER THIS STATEMENTS BY MR IVER. DON'T HAVE SENSE OR MERITS BECAUSE KNOWING CLEARLY THAT MR IVER HATE ME. WILL I TELL TO HIM FOR EXAMPLE WHO ALLOW OR NOT ALLOW ME JERK OFF OR MASTURBATE FRONT THEY? I NEVER WILL TELL SOMETHING LIKE THAT TO MR IVER & NO ONE IN. BECAUSE I'M NOT A BIG MOUTH & I WILL NOT REPORT OR PUT IN TROUBLES TO ANY REMAKER WHO ALLOW OR LET ME PASS A GOOD TIME, SO, MR IVER IS A LIE.

89) I AM SUFFERING CLEARLY IMMINENT DANGER IN GREAT MEADOW CR SHU IN THE HANDS OF THE DEFENDANTS. NO ACCESS TO MEDICAL CARE IN ALL NO ACCESS TO SICK CALL SERVICES IN ALL. NO ACCESS TO HEALTH SERVICES IN ALL, THE DOCTORS, HAS STOPPED TO SEE ME SINCE APRIL 2016 TO THE PRESENT MY T.B. MEDS & PAIN MEDS I DON'T HAS YET BE PRESCRIBED BACK MY PSYCHIA-TRIC MEDS. WERE DISCONTINUED IN JUNE 2016. MY DEPRESSION LACK OF SLEEP DISTRESS ARE WORSE. THE RESTRICTED DIETS FOR 6 MONTHS & THE EFFECTS & SYMPTOMS, AND MY CELL CONDITION OR CONFINEMENTS ARE SERIOUS INCLUDING MY GUM DISEASES/INFECTIONS AND THE DENTAL OF CLEAN IT EVERY 3 MONTHS.

7.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

1st 8th AND 14th AMEND RIGHTS U.S CONSTITUTIONS.
 42 USC 1983 42 USC 1985 (DELIBERATE INDIFFERENCE TO PLAINTIFF'S MEDICAL AND MENTAL HEALTH NEEDS CRUEL AND UNUSUAL PUNISHMENT DEPRIVATION OF DUE PROCESS FAILURE TO INTERFERE EDVAC PROTECTION FREE EXERCISE OF RELIGION RETALIATION DISCRIMINATION CONSPIRACY INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UNDER NEW YORK COMMON LAW. NEGLIGENCE INFLICTION OF EMOTIONAL DISTRESS UNDER NEW YORK COMMON LAW. ASSAULT UNDER N.Y. COMMON LAW. BATTERY UNDER NEW YORK COMMON LAW. CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS (28 USC § 1331-1343(a)(3) § 28 USC § 1367

SECOND CAUSE OF ACTION

ZIMMERMAN V. BURGE NO. 06-CV-0176 2009 U.S. DIST LEXIS 88344 *34-35 2009 WL 9054936 (N.D.N.Y. APR. 20, 2009) (FINDING THAT DEPRESSION IS A SUFFICIENTLY SERIOUS "MEDICAL CONDITION") WILLIAMS V. KIRKPATRICK 801 F.3d 51, 68 (2d Cir. 2015) AND Buggs V. STATE 25 N.Y.S.3d 545 (2d Cir. 2015) REGARDING THE WORK/RESTRICTED DUTY. DOCS DENIED (CLEANING MATERIALS) TO INMATES AND OTHER VIOLATIONS, HAMILTON V. FISCHER, 2015 WL 8207439 (W.D.N.Y. DEC. 7, 2015) RODRIGUEZ V. MCLENNING 399 F. SUPP. 2d 228 (SDNY, 2005) CRAWFORD V. WOMO 796 F.3d 252 2nd Cir. 2015 (ABOUT SEXUAL ASSAULTS) SERRANO SCHWENK V. HORTA 2014 F.3d 1187 PEOPLE V. FISCHER 11 CV 2694 (SDNY) JOHNSON V. STORANI 233 F.3d 486 (2000)

THIRD CAUSE OF ACTION


ASSEMBLY STATE OF NEW YORK BILL (SHE BILL); THE ASSEMBLY BILL 4401; CORRECTION LAW SECTIONS 70(6)(C)(6); § 137(5); § 138 § 139 § 112, 83 N.Y. JUR. 2d PERAL AND CORRECTIONAL INSTITUTIONS PATIENTS' BILL OF RIGHTS ADA TITLE II AND SECTION 504 VIOLATIONS IMPLEMENTATION OF HUMAN RIGHTS TREATIES 63 FR 68991 INTERNATIONAL COVENANT ON CIVIL RIGHTS (ICCPR); THE CONVENTION AGAINST TORTURE AND OTHER CRUEL, INHUMAN OR DEGRADING TREATMENT OR PUNISHMENT (CAT); THE CIVIL RIGHT ACT OF 1964; THE CONVENTION ON THE ELIMINATION OF ALL FORMS OF RACIAL DISCRIMINATION (CERD) THE FEDERAL LAWS AND NEW YORK STATE LAWS UNDER THE CLEAN AIR ACTS. 18 USCA SECTION 1091 GENOCIDE, DOCS DIRECTIVES 4932 & 4933 (CHAPTER V. CHAPTER VI. TITLE 7 NYRR, DOCS EMPLOYEE'S MANUAL, DOCS DIRECTIVE 4101 DOCS HEALTH SERVICE POLICY MANUAL, THE FEDERAL LAW UNDER THE GENDER MOTIVATED VIOLENCE ACT (GMVA) AND THE HIPPA/FEDERAL LAW REGULATIONS. § 18 USCA § 241 & § 242 AND 18 USC 1741 & PATTERN & PRACTICE OF CONDUCT BY OFFICERS.

8. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief: AWORDING Plaintiff Damages, as a result of Defendants Deliberate Indifference to Plaintiff Medical and Mental Health Needs his medications, the cruel and unusual punishment failure to intervene inadequate diets violation of Plaintiff's right to free exercise of religious, retaliation, intentional infliction of emotional distress, assault battery, conspir- -rancy to interfere with Plaintiff civil rights, and awording Plaintiff Punitive Damages for costs in the amount of \$6 millions (Six Millions Dollars) AND ORDERED TO Defendants to END the violations

I declare under penalty of perjury that the foregoing is true and correct.

DATED JUNE/23/2016


CARLOS ABREU

Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010

VERIFICATION

STATE OF NEW YORK)
COUNTY OF WASHINGTON, SS:

CARLOS ABREU being duly sworn
deposes AND SAYS THAT DEPONENT
IS THE PLAINTIFF - PETITIONER IN THE
above CAPTIONED PROCEEDING - ACTION
that he has read the foregoing com-
plaint - petition AND KNOWS THE
CONTENTS thereof that the same is
TRUE TO DEPONENT'S OWN KNOWLEDGE
EXCEPT AS TO MATTERS THEREIN STATED
UPON INFORMATION AND BELIEF which
MATTERS DEPONENT BELIEVES TO BE TRUE

Respectfully Submitted

Carlos Abreu
CARLOS ABREU

SWORN TO before
me on this 23 day
of June 2016
Edward C. Carpenter
NOTARY PUBLIC

Edward C. Carpenter
Notary Public, State of New York
Qualified in Washington Co. No. 01CA6193364
My Commission Expires September 15, 2016